

HALL & EVANS, LLC
1160 North Town Center Drive
Suite 330
Las Vegas, Nevada 89144
(702) 998-1022

HALL & EVANS, LLC
KURT R. BONDS, ESQ.
Nevada Bar No. 6228
JAROD PENNIMAN, ESQ.
Nevada Bar No. 16299
1160 North Town Center Drive
Suite 330
Las Vegas, Nevada 89144
(702) 998-1022
nvefile@hallevans.com
bondsk@hallevans.com
pennimanj@hallevans.com
Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

* * *

WILLIAM RABAGO, an individual;

CASE NO.: 2:24-cv-00356-JAD-EJY

Plaintiff,

v.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

LAURA MAZEL, an individual; EMMETT
REED, an individual; DOES I
through X, inclusive; and ROES I through X,
inclusive;

(First Request)

Defendants.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff WILLIAM RABAGO, by and through his counsel of record, the law office of LAWRENCE C. HILL & ASSOCIATES and Defendants LAURA MAZEL and EMMETT REED, by and through their counsel of record, the law office of HALL & EVANS, that discovery in this matter shall be extended for ninety (90) days.

///

///

I. REASON FOR REQUESTED CONTINUANCE

The parties request this extension due to ongoing investigation into the subject accident in this matter, including, but not limited to, serving a subpoena upon the manufacture of Defendants' vehicle. As such, the parties seek to conduct all necessary investigation prior to making expert disclosures to avoid any unnecessary timing and discovery disputes.

The parties assure this Court that with an accommodation, they will continue to work together to diligently move this case along.

II. DISCOVERY COMPLETED TO DATE

As of the date of this Stipulation, the Parties have exchanged their initial disclosures of witnesses and documents as required by Rule 26 of the Federal Rules of Civil Procedure and written discovery requests and responses and have conducted depositions.

III. DISCOVERY TO BE COMPLETED

1. Initial expert disclosures;
2. Rebuttal expert disclosures;
3. Additional medical records collection, as necessary;
4. Additional written discovery;
5. Potential IME;
6. Depositions of treating medical providers and expert witnesses;

IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

Based on the foregoing, the parties agree that good cause exists to extend the discovery deadlines as follows:

EVENT	CURRENT DEADLINES	PROPOSED NEW DEADLINES
Last Day to Disclose Initial Experts:	August 19, 2024	November 18, 2024
Last Day to Disclose Rebuttal Experts:	September 19, 2024	December 18, 2024

Close of Discovery:	October 18, 2024	January 16, 2025
Last Day to File Dispositive Motions:	November 18, 2024	February 17, 2025
Last Day to Submit Joint Pretrial Order:	December 17, 2024	March 17, 2025

V. CURRENT TRIAL DATE

The parties request that the trial date be continued in accordance with the proposed deadlines set forth above.

DATED this 20th day of June, 2024.

DATED this 20th day of June, 2024.

LAWRENCE C. HILL & ASSOCIATES

HALL & EVANS

/s/ Lawrence C. Hill

/s/ Kurt R. Bonds

LAWRENCE C. HILL, ESQ.

Nevada Bar #11989

SEAN P. O'CALLAGHAN, ESQ.

Nevada Bar #15447

2020 W. Sunset Road

Henderson, Nevada 89014

(702) 530-5688

Attorneys for Plaintiff

KURT R. BONDS, ESQ.

Nevada Bar #6228

JAROD PENNIMAN, ESQ.

Nevada Bar #16299

1160 North Town Center Drive

Suite 330

Las Vegas, Nevada 89144

(702) 998-1022


Attorneys for Defendants

ORDER

Pursuant to the stipulation of the Parties, and good cause appearing, the following discovery-related deadlines are extended as follows:

EVENT	CURRENT DEADLINES	PROPOSED NEW DEADLINES
Last Day to Disclose Initial Experts:	August 19, 2024	November 18, 2024
Last Day to Disclose Rebuttal Experts:	September 19, 2024	December 18, 2024
Close of Discovery:	October 18, 2024	January 16, 2025
Last Day to File Dispositive Motions:	November 18, 2024	February 17, 2025
Last Day to Submit Joint Pretrial Order:	December 17, 2024	March 17, 2025

IT IS SO ORDERED.


United States Magistrate Judge

Dated: June 20, 2024

DATED this 20th day of June, 2024.

HALL & EVANS, LLC

/s/ Kurt R. Bonds
KURT R. BONDS, ESQ.
Nevada Bar No. 6228
JAROD PENNIMAN, ESQ.
Nevada Bar No. 16299
1160 North Town Center Drive
Suite 330
Las Vegas, Nevada 89144
(702) 998-1022
nvefile@hallevans.com
bondsk@hallevans.com
pennimanj@hallevans.com
Attorneys for Defendants

HALL & EVANS, LLC
1160 North Town Center Drive
Suite 330
Las Vegas, Nevada 89144
(702) 998-1022